

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:17 CR 532 HEA
)	
TALEB JAWHER,)	
)	
Defendant.)	

GOVERNMENT’S MOTION TO CONTINUE SENTENCING DATE

COMES NOW the United States of America, by and through Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and John J. Ware, Assistant United States Attorney for said District, and moves the Court to continue the sentencing date in this case and in support thereof states:

1. Defendant is currently scheduled to be sentenced on December 3, 2018.
2. Defendant filed objections to the PSI on November 20, 2018. These objections primarily involve the applicable cross-reference section found in §2A1 to defendant’s offense. While defendant stated his objections, the legal memorandum supporting his legal arguments are to be filed in his sentencing memorandum.
3. Both parties agree that the issue is legally complicated. In a conversation with the undersigned, defendant’s attorney, Mr. Fein, previewed some of the legal arguments he will be submitting in his sentencing memorandum. Some of those arguments will require significant research in order to file a competent response.
4. The parties agree that the following schedule will provide adequate time for the parties to fully brief the issues and allow the Court time to read the memoranda. The parties

propose that defendant's sentencing memorandum be filed by December 6, 2018, that the government reply by December 20, 2018, and that the sentencing hearing be scheduled during the week of January 14th or any time thereafter convenient to the Court's calendar.

WHEREFORE, the government, with no objections from defendant, moves the Court to continue sentencing in this case to a date consistent with the above proposal.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ John J. Ware
JOHN J. WARE, #40880MO
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, Missouri 63102

CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2018, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon all counsel of record.

/s/ John J. Ware
JOHN J. WARE, #40880MO
Assistant United States Attorney